



A Question of Access: Section 508, ADA and You

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Functional Definition of Accessibility



- The goal is to provide students [and other users] the opportunity to:
 - acquire the same information;
 - engage in the same interactions; and
 - enjoy the same services
 as students without
 disabilities, with
 substantially equivalent
 ease of use.







Section 508 and 45 CFR 1170

- Section 508 of the Rehabilitation Act of 1973
 - Applies to federal agencies when developing, procuring, maintaining, or using electronic and information technology.
- 45 Code of Federal Regulations Part 1170
 - No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance.
 - [46 FR 55897, Nov. 12,1981, as amended at 68 FR51386, Aug. 26, 2003]







Texas Laws

- Texas Government Code 2054.454
 - each state agency [and public institution of higher education] shall develop, procure, maintain, and use accessible electronic and information resources that conform to the rules adopted under this subchapter.
 - Added by Acts 2005, 79th Leg., Ch. 750 (H.B. 2819), Sec. 1, eff. September 1, 2005

- Texas Administrative Code
 - Title 1, Part 10, Ch. 206
 - Applies to websites; requires them to comply with section 508
 - Title 1, Part 10, Ch. 213
 - Applies to all other electronic and information resources (EIR), including procurements (§213.18)
 - The provisions of this §213.18 adopted to be effective September 16, 2008, 33 TexReg 7744; amended to be effective November 17, 2009, 34 TexReg 8027; amended to be effective September 18, 2014, 39 TexReg 7565







ADA

- Americans with Disabilities
 Act of 1990
 - Title I Employment
 - Title IIState and Local GovernmentServices
 - Title III
 Public Accommodations and
 Commercial Facilities
 - Title IVTelecommunications

Notes on ADA

- Focus on physical access;
 does not explicitly reference
 websites or electronic and
 information resources.
- The Department of Justice
 has found that websites and
 EIR for non-federal and non state businesses (including
 institutions of higher
 education) fall under ADA as
 public accommodations.
- Case law is mixed but the trend is towards requiring accessibility for websites.







ADA Case Law 2019

- Robles v. Domino's (2016)
 - Domino's violated ADA by not making its website accessible under the ADA. US Supreme Court declined to hear Domino's final appeal.
- National Association of the Deaf v. Harvard University (2015)
 - Harvard violated ADA by not captioning online resources (audio and video) on their website. Settlement requires high-quality captioning services for all online content.
- Payan v. Los Angeles Community College District (2017)
 - LACCD violated ADA by not making the college website, library databases, and educational technology accessible under the ADA. Content must conform to WCAG 2.1 within one year. Under appeal.







W3C Web Accessibility Initiative

- Web Content
 Accessibility Guidelines
 (WCAG)
 - WCAG 2.0, published on Dec. 11, 2008
 - WCAG 2.1, published on June 5, 2018
- Resources available on the WAI website.

- 4 principles:
 - Perceivable
 - Operable
 - Understandable
 - Robust
- Success Criteria:
 - A (minimum)
 - AA (just right)
 - AAA (maximum)







Section 508 & WCAG

- 36 CFR Parts 1193 and 1194, published January 2017
 - E205.4 Accessibility Standard. Electronic content shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0
 - Effective March 20, 2017
 - Compliance required after January 18, 2018







VPAT

- Vendors of ICT/EIR must provide a VPAT or equivalent information showing conformance to the standard
 - Voluntary Product Accessibility Template
 - Developed and maintained by ITI (no charge)
 - https://www.itic.org/policy/accessibi
 lity/vpat
 - Different versions for different accessibility requirements

- Per TAC §213.18, state agencies and public institutions of higher education must request accessibility information vendors using one of the following:
 - the URL to completed VPATs or equivalent reporting templates;
 - an accessible electronic document that addresses the same accessibility criteria in substantially the same format as VPATs or equivalent reporting templates; or
 - the URL to a web page which explains how to request completed VPATs, or equivalent reporting templates, for any products under contract;







Accessibility Testing

- Not required by any state or federal law
- Often needed to verify vendor claims in VPATs
 - Some vendors interpret WCAG strictly, others loosely
 - Watch for "partially supports" language
- TSLAC tests (in-house) every electronic resource we license. Results of tests plus review of VPATs determine need for exceptions.
 - TSLAC currently uses screenreaders (JAWS and NVDA),
 WAVE (extensions for Chrome and Firefox), and
 manual checks to determine accessibility.
 - Independent testing will begin in June 2020.







Exceptions

- Section 508
 - "Safe Harbour" for existing ICT
 - Undue Burden or Fundamental Alteration
 - Best Meets (marketplace exception)
- ADA
 - Undue Burden or Fundamental Alteration
 - Small businesses
 - Private clubs
 - Religious organizations or entities controlled by such organizations

Texas

- Significant difficulty or expense
- Exception requests must include:
 - Expiration Date
 - Alternate means of access
 - Justification for the exception
 - Documentation







Exceptions & Exemptions

- Exception:
 - State agencies
 - Institutions of Higher Education
- Exemption:
 - Statewide (through DIR)
 - Current
 - Geographic Information Systems (GIS) Software







Functional Definition of Accessibility Again



- The goal is to provide students [and other users] the opportunity to:
 - acquire the same information;
 - engage in the same interactions; and
 - enjoy the same services
 as students without
 disabilities, with
 substantially equivalent
 ease of use.







Case Study: HeritageQuest









Genealogy Solicitation 2019 Take 1

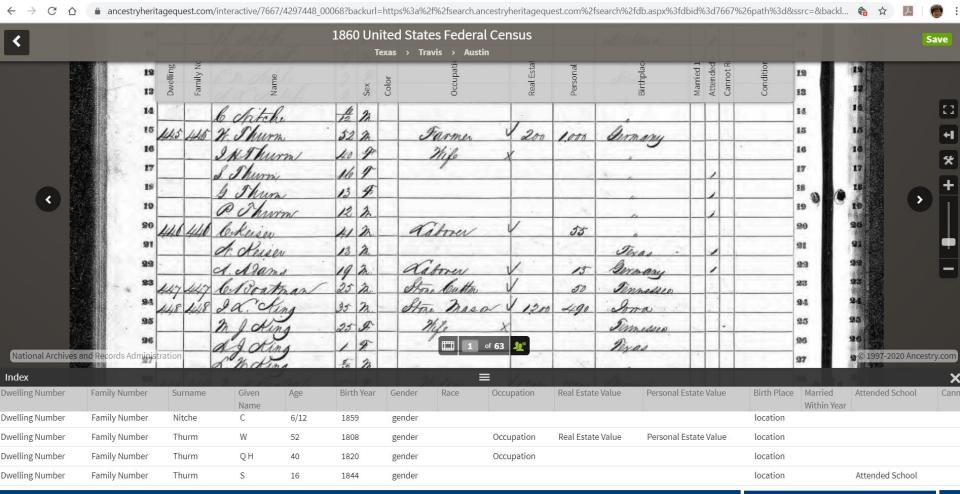
- 306-19-0039
 - Vendor must submit a Voluntary Product Accessibility Template (VPAT) showing WCAG 2.0 compliance at the AA level. Offered resources that do not meet this requirement will be deemed non-responsive. VPATs must be updated annually and prior to release of any major resource interface update.
 - All bids non-responsive.







HQO: Census Browse

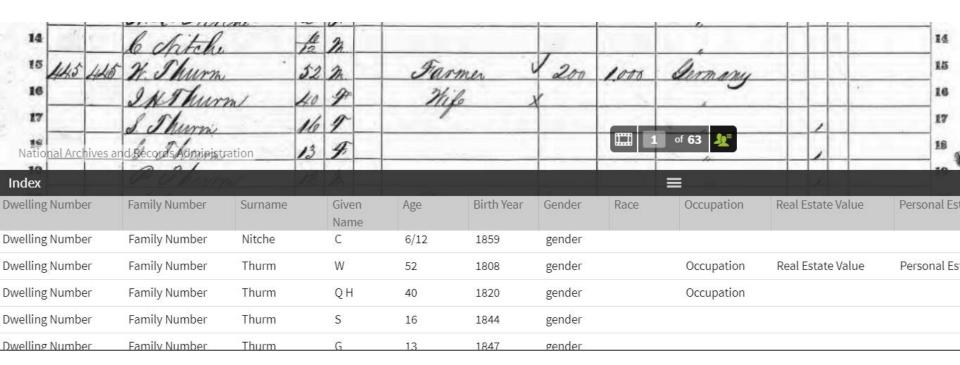








HQO: Census Browse (enlarged)

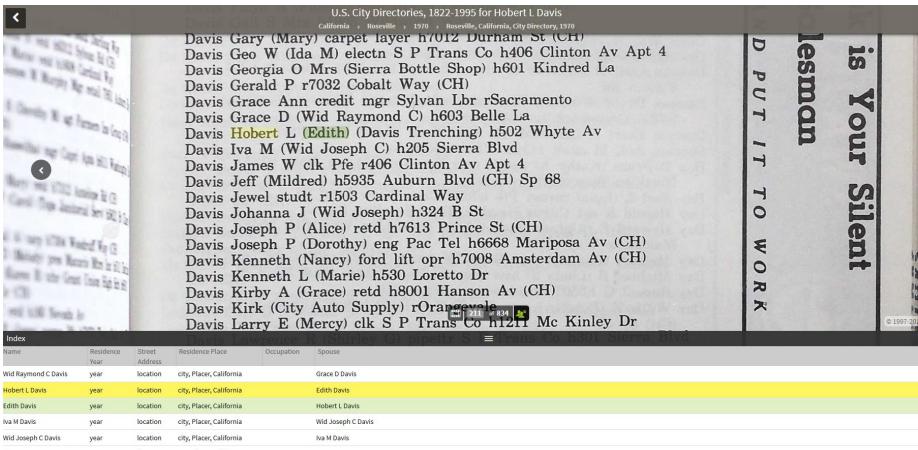








HQO City Directory

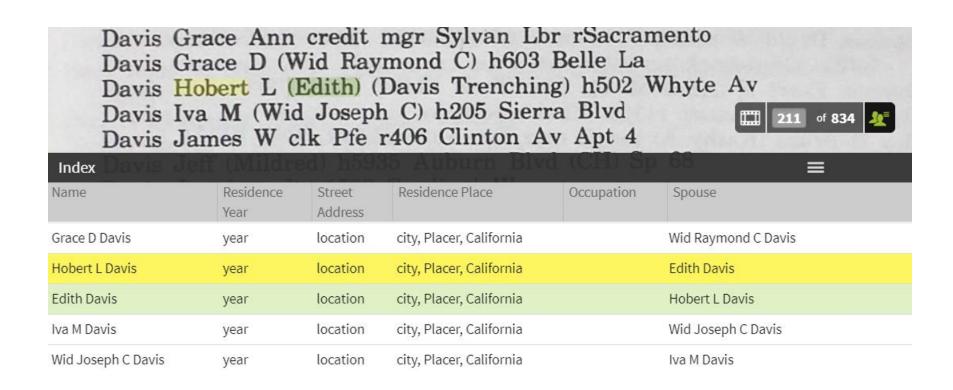








HQO City Directory (enlarged)









Genealogy Solicitation 2019 Take 2

- 306-19-0334
 - Vendor must submit a Voluntary Product Accessibility Template (VPAT) showing WCAG 2.0 compliance at the AA level. Offered resources that do not meet this requirement must provide a roadmap showing how full compliance will be achieved. If full compliance is not possible due to the nature of the content available in the resource, Vendor must explain the nature of the limitation and any alternative means of accessing content for a possible exception to this requirement. VPATs must be updated annually and prior to release of any major resource interface update.







HQO: Accessibility Roadmap

Milestone	Date
1. Accessibility improvements to front page, including removing non-accessible content (e.g., help videos) and ensuring that any PDF files linked from the front page (e.g., help files) have tags identifying the structure of the text for screenreaders.	May 1, 2019
Complete VPAT (Using template version 2.3 or later) submitted to TSLAC.	July 1, 2019
3. Accessibility improvements to interactive maps in the "Map Guide to the U.S. Federal Censuses, 1790-1920."	October 1, 2019
 Add a comment to record results pages indicating that content in index may not include all information available in the image. Optionally, include a statement to contact a librarian for assistance. 	TBD
Total Price (17 months)	\$531,250







HQO: Accessibility Exception

https://www.tsl.texas.gov/sites/default/files/public/tslac/texshare/TexShare Databases/HeritageQuestOnline-exceptionpacket-20190422 Redacted.pdf

TOWNSTOR	eronic and information and inf		· ,
1. Requester Information			
Requester Name: Danielle Cunniff Plumer	Job Title: Statewide Reso Administrator	ource Sharing	Date: April 22, 2019
Email: dplumer@tsl.texas.gov		Phone: (512)	463-5433
Office Address: 1201 Brazos St.	City: Austin	State:	: TX ZIP: 78701
Program or Division: Library Development and Net	working	EIR Owner: [Danielle Plumer
2. Description of Inaccessible EIR	_		
EIR Title: HeritageQuest Online™			
EIR Description (if applicable, include URL address HeritageQuest Online™ is a web-based aggregation of An directories, local and family histories, and U.S. government libraries through the TexShare Databases Program. The U	nerican genealogical sources, in t records. It is provided to Texa	ncluding U.S. cer is academic, pub	nsus records, city olic, medical, and special
EIR Type: Web page	(PDF, MS Word, PPT, etc.) content		c form are or office equipment
EIR Status: Under development. Enter planned completion of Under revision. Completed. Acquired or procured from third party (Name of a		iest)	
The usage scope for this EIR is (check all that app Public facing, high traffic Internal use, high number of users Mission critical for service delivery Used in staff development or training Other (Describe):	ily): ☑ Public facing, mode ☐ Internal use, low nui ☐ Required to perform	mber of users	ob function
3. Justification for Exception			
Select the reason(s) for requesting this exception Cost prohibitive Adequate skilled resources unavailable Nearing end of life cycle Other (Describe):	n (check all that apply): Underlying EIR tech Large programming Marketplace except	impact	n not accessible
_ outer (Describe).	(Question 3, "Justification	for Exception,"	continued on next page.)

3. Justificatio	n for Exception (Quest	ion 3 contir	nued from p	previous page.)		
Provide supp	orting information to	justify thi	s request:			
	•				have insuffic	ient contrast to be readable.
Indexes provide	d on screen frequently c	ontain incom	plete and/o	r incorrect information. Gro	ounds for exc	eption:
1. Fundar	mental Alteration. Bringin	ng this or any	similar pro	duct into full conformance	would require	replacing partial indexes
with ful	transcription of handwr	itten materia	ls and corre	ection of OCR-generated tr	anscriptions (of printed materials. ProQuest
has arg	ued that bringing the re	source into fi	ull complian	ce would constitute an Un	due Burden o	n them and Ancestry.com,
which p	provides the platform and	d content.				
2. Best M	eets. Based on solicitation	ons by TSLA	C, no comp	parable product exists that	fully conforms	s to accessibility standard.
	sibility Evaluation: (Genealogy -	ProQuest Heritage Quest	Online FY20	19
Estimated cos	st of bringing the EIF	R into com	pliance (d	evelopment cost, time, e	etc.):	
						has not provided an estimate
_	an stating that the cost v				1110 1011001	The first provided an obtained
Planned Acce	ssibility Compliance	date:				
l			ded interfac	re improvements by start o	of contract and	d as identified thereafter (see
	•					2.0 at the AA level without a
1	Iteration of the resource			•		
Other relevan	t information:					
		WCAG 2.0	at the AA le	vel. it represents a signific	ant improvem	ent in accessibility compared
	per records or unindexe					
4. Alternative	Compliance Methods					
Describe the alternative means of access, including time and expense to implement:						
1	Users may request the assistance of a sighted user to access information in the underlying content that is not available in the index.					
		_				not include all information
available in the image. TSLAC librarians and reader consultants will work with TSLAC patrons as needed; TexShare member libraries						
will perform the same service for their patrons.						
5. Recommen	dations					
	Name	Approve	Deny	Signature		Date
EIR Owner:	Danielle Plumer					Date: 04/22/19
Contract Mgr.:	Russlene Waukechon					Date:
LDN Div. Dir.:	Jennifer Peters					Date:
Acc. Coord.:	Mike Avila					Date:
CFO:	Donna Osborne					Date:
6. Executive I	Director					
	This exception request is: Approved Denied					
Comments:						
Duration of Exception Granted: ☐ 3 mo. ☐ 6 mo. ☐ 12 mo. ☐ 24 mo. ☐ Other (specify):						
Executive Director Signature: Date:						







TexShare Accessibility

- Plans for 2020:
 - VPAT site so that TexShare and TexQuest participants can access current vendor VPATs
 - Including VPAT for TexShare Portal, https://texshare.net
 - Provide reports of independent testing of licensed resources
 - Provide links to other sites with accessibility reports
 - Big 10 Alliance & Association of Southeastern Research Libraries









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RESOURCES FOR: STUDENTS ADMINISTRATORS

STRATORS FACULTY

About Leadership Development

Libraries Pt

Purchasing Technology

Research

<u>Home</u> > <u>Libraries</u> > <u>Library E-Resource Accessibility</u> > Testing

Library E-Resource Accessibility - Testing

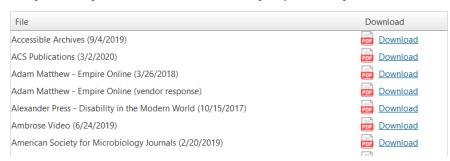
Introduction Testing Standardized License Language

Library Accessibility Alliance

ACADEMIC ALLIANCE

E-Resource Testing

Beginning in 2019 the Big Ten Academic Alliance and Association of Southeastern Research Libraries have funded third-party accessibility evaluations for select vendor e-resources based upon recommendations from the member libraries and the platforms that the majority of the consortia own or are considering for purchase. Evaluations, along with any responses provided by vendors, are below. The program provides vendors with a report and the opportunity to improve the accessibility of their products while giving members of the library community information about the accessibility of specific library e-resources.





Library Accessibility Alliance Contacts:

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Principles of Accessible Design

A Beginner's Guide

TLA2020

* VIRTUAL *







What Needs to be Accessible?

- Library Web Pages
- Electronic Documents
 - Word Documents
 - PDFs
 - PowerPoint Presentations







Accessible Design: Who is it for?

Users with	Differences in E-content Navigation
Low Vision	May increase font size or use screen magnifier tool. Need high-contrast colors.
LOW VISIOII	Can sometimes lose track of cursor.
No Vision	Use screen reader tools that read text and web functions out loud. Keyboard navigation only – no mouse.
Physical Impairments	May have limited or no mouse use.
Physical Impairments	Primarily use keyboard navigation.
Hearing Impairments	Needs captions for audio or video content.
Cognitive Impairments	Limit or remove moving or flashing content. Remove or give warning about timed content.







Use Headings

- ➤ **H1** Title of Page
 - **H2** Major Section
 - **H3** Subsection
 - **H3** Subsection
 - **H2** Next Major Section
 - **H3** Subsection
 - **H3** Subsection
 - **H3** Subsection







Use Headings *Properly*



- > H1 Summer Reading 2020
 - **H2** Youth Summer Reading
 - **H3** Youth Reading Logs
 - **H3** Youth Reading Prizes
 - **H2** Teen Summer Reading
 - **H3** Teen Reading Logs
 - **H3** Teen Book Club
 - H3 Teen Reading Prizes







Don't Use Headings Improperly



- ➤ H1 Summer Reading 2020
 - **H2** Youth Summer Reading
 - **H3** Youth Reading Logs
 - **H3** Youth Reading Prizes
 - **H2** Teen Summer Reading
 - **H3** Teen Reading Logs
 - H3 Teen Book Club
 - H3 Teen Reading Prizes

X Disordered, Confusing Headings

- H4 It's summer and you know what that means...
- **H2** It's Summer Reading Time!!
 - o **H3** Part I
 - o H3 Part II
- ➤ **H1** DEADLINE FOR PRIZES IS AUGUST 31!!!
- **H2** Teens check this out
 - H4 Stuff That Isn't Twilight
 - **H3** Don't forget to pick up your prizes!







Make All the Things Descriptive

Non-descriptive Link Text

For our technology workshops link>

For our summer reading program <link>click here </link>

<link>Go here</link> to see our hours and locations

Descriptive Link Text

Please visit our <link><u>Technology Workshops</u></link>

The Summer Reading Program begins 5/9

More on our <link>Hours and Locations







Make All the Things Descriptive

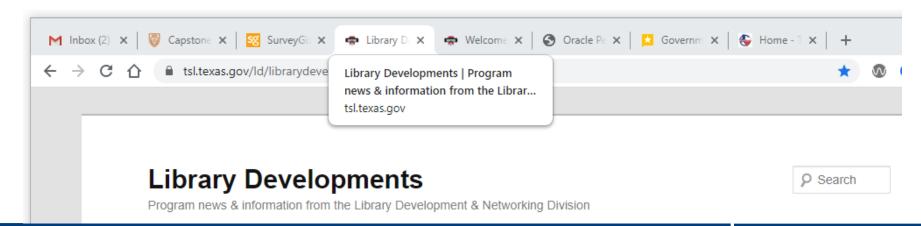
Descriptive Page Title

Displayed on the top bar or tab in your browser

In the HTML code: <title>Technology Workshops</title>

Be specific: "Blah Public Library: Summer Reading", not "Blah Public

Library" on every page









Describing Images with Alt Tags



Alt tags should briefly describe the important information image conveyed by the image.

When a screen reader detects an image with no alt tag, it reads the file name out instead.

Most web editors have a field where you can enter alt text

Can also be done in the code:

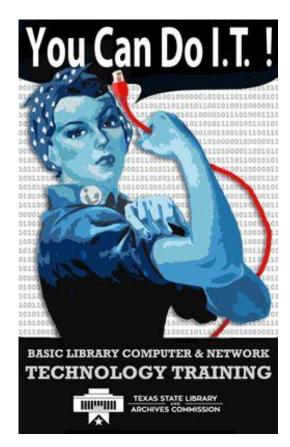
<img src="ycdit.png" alt="You Can Do
IT workshop promo poster">







Describing Images with Alt Tags



Best Practices

Don't write "picture of" – the screen reader will identify it as an image.

Okay Description

alt = "Image of a blue woman with a red cable who says You Can Do I.T"

Better Description

alt = "A 1940's era working woman holding an ethernet cable, flexing her bicep and saying You Can Do I.T."







Other Types of Alt Tags





Getting Started

Most Popular

Resou

GETTING STARTED

The TexShare Databases allow you to access over 27,000 journals, over 171 and interactive resources. To help you get started, we've selected some reso resources, view our Most Popular page, or if you know what you're looking fc our A-Z list.



Credo Complete Core Collection

Credo is an easy-to-use tool for research, homework, and Gather background information on your topic from over one encyclopedias, subject handbooks, and current events resimages and audio files and over 1,000 videos.



Academic Search Complete

A comprehensive resource of full-text academic journals, v dozens of subjects ranging from anthropology, chemistry a studies and zoology.



Gale In Context: Opposing Viewpoints

OVIC is an engaging online experience for those seeking c opinions on hundreds of todays hottest social issues. Topic magazines, academic journals, news articles, primary sour images, videos, and audio files.

Decorative Images

Only there to look nice, or repeats adjacent information presented in text.

Use "null" alt text:

In web editor, mark image as decorative







Other Types of Alt Tags









Functional Images

Buttons, Image Links

Alt text:

Describe the function or text of the link or image, not its appearance

Functional description

alt = "Book Connections"

Non-Functional description

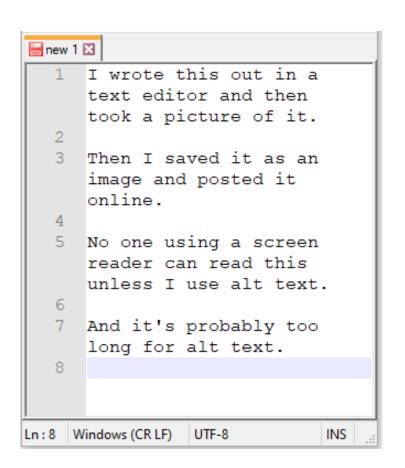
alt = "White button with a stylized book icon for the Book Connections resource"







Other Types of Alt Tags



Images as Text

A picture file of written text

Don't do this. Like, really, if you don't have to, don't do this.

Alt text:

If you do have to, match the alt text exactly to the image text

If it's long, consider posting a text transcription on the page.







Accessible Design Word Documents and PDFs

Use styles instead of text attributes

Use similar heading structure to web pages

Title – Heading 1 – Heading 2 – Normal Text

Headings will become bookmarks in a PDF

Add Alt Text for all images

Right-click on image – Select "Edit Alt Text"

Save as PDF – these features *should* carry over, but double check







PowerPoint Slides

Themes & Designs

High contrast, not too busy

Add Alt Text for images

- Right-click on image Select "Edit Alt Text"
- Decorative images: leave blank, check box for "Mark as decorative"

Slide Reading Order

- Use layouts when possible
- Check reading order for custom layouts







PowerPoint Slide Order Demo

Here's a Subtitle

Informational Box 1

Placeholder text blah blah

•

•

-

blah

Informational Box 2

Placeholder text blah blah

•

_

_

.

blah

Informational Box 3

Placeholder text blah blah

•

.

•

blah

Hint: Go to Home > Arrange > Selection Page







Takeaways

Accessible Design is Good Design

Incorporate Accessible Design from the Beginning

Access to Information is a Human Right







Contact Us

Website: https://www.tsl.texas.gov/texshare/

PowerPoint available in **TexShare News**

Email: texshare@tsl.texas.gov

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